

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

§

VS

§

NO. 5:21-CR-00154-FB-1

JUAN ENRIQUE KRAMER

§

DEFENDANT'S MOTION FOR BOND

TO THE HONORABLE UNITED STATES DISTRICT JUDGE, WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:

COMES NOW JUAN ENRIQUE KRAMER, Defendant in the above-entitled and numbered cause, by and through his attorney, files this Motion for Bond in the above-entitled and numbered cause and in support hereof, Defendant would show the following, to wit:

I.

Mr. Kramer is currently detained at the Eden County Detention Center in Eden, Texas and is scheduled for Jury Trial on January 10, 2022 for the above listed cause.

II.

The undersigned is respectfully requesting a bond in order to exercise the right to effective assistance of counsel as guaranteed by the 6th Amendment to the United States Constitution. The Defendants current location in Eden County Detention Center impedes his access to counsel in both his criminal and immigration case.

III.

Mr. Kramer is the head of his household and significantly contributed to the financial stability of his family as well as assisting in the childcare duties. Since being held without bond Mr. Kramer's family has faced increasing hardship. Being self-employed, Mr. Kramer is in a

unique position to continue to guide and aid his family while he continues to defend himself in the cause.

IV.

Mr. Kramer has lived in the United States for many years and considers this country his home. He has three children, who have been raised in the United States. Before his indictment, Mr. Kramer was already trying to become a citizen of the United States. Additionally, neither he nor his wife fled the United States once they had knowledge of investigation into one their business. He would like the court to know that he has no other deportable offenses and states that he is not a flight risk. IV.

V.

Mr. Kramer respectfully request that he be released on bond under such conditions as will reasonably assure his appearance as required and will assure the safety of any other person of the community. Specifically, Mr. Kramer would request that he be given the opportunity of home confinement with electronic monitoring device.

WHEREFORE, premise considered, the Defendant respectfully request that he be granted bond while awaiting sentencing.

Respectfully Submitted,

LAW OFFICES OF ALAN BROWN
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ALAN BROWN
BAR NO. 03090000

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of September 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

U.S. Attorney's Office
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

/S/
ALAN BROWN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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ORDER

On this date came to be considered Defendant's Motion for Bond. After consideration of same, the Court is of this opinion that said Motion is hereby:

GRANTED DENIED

IT IS HEREBY FURTHER ORDERED THAT: _____

SIGNED and ENTERED on this the _____ day of _____, 2021.

U.S. DISTRICT JUDGE